

February 28, 2011

Mr. Gary Greulich  
New Jersey Department of Environmental Protection  
Northern Regional Office  
7 Ridgedale Avenue  
Cedar Knolls, NJ 07927

RE: Remedial Action Progress Report No. 6 for the Industrial #1 Redevelopment Area  
Portion of the Former General Motors (GM) Linden Assembly Plant, 1016 West Edgar  
Road, Linden, Union County, New Jersey 07036; DUK059.701.0042.

Dear Mr. Greulich:

On May 28, 2009, the New Jersey Department of Environmental Protection (NJDEP) approved the New Jersey Remedial Action Workplan and RCRA Corrective Measures Proposal Addendum No. 2 (RAWP) for the Industrial #1 Redevelopment Area of the Former GM Linden Assembly Plant (Site; SRP PI# 014755; EA ID# SUB090001; BFO File Number: 20-09-24). The May 28, 2009 approval letter requested Remedial Action Progress Report for the Industrial #1 Redevelopment Area on/by November 30, 2009. Subsequent reports are submitted on a quarterly basis.

This letter constitutes Remedial Action Progress Report No. 6 for the Industrial #1 Redevelopment Area. Hull & Associates, Inc. (Hull) has prepared this report on behalf of Linden Development LLC (Linden Development) to summarize remedial activities completed on the Site between December 1, 2010 and February 28, 2011.

Requirements, according to N.J.A.C. 7:26E-6.6, are shown below in ***bold italics***, with Hull/Linden Development's update following. The report certification required by N.J.A.C. 7:26E-1.5 is included in Attachment A.

1. ***NJDEP requires a description of each planned remedial action:***
  - i. ***scheduled to be initiated or completed within the reporting period***
  - ii. ***actually initiated or completed during the reporting period; and***
  - iii. ***scheduled but not initiated or not completed during the reporting period, including the reasons for the noncompliance with the approved schedule.***

Soil

As outlined in the approved RAWP, the remedial activities for soils on the Industrial #1 Redevelopment Area consist of the following:

- a. Establishing deed restrictions or environmental covenants to maintain commercial/industrial land use at the Site;
- b. Regrading the site to achieve the grade necessary to support the proposed redevelopment;



- c. Constructing building slabs, parking areas and roadways and placing one foot of clean soil over geotextile fabric in future greenspaces to preclude direct contact exposures to future receptor populations and/or provide cover to historical fill material; and
- d. Surveying to demonstrate that all areas are covered with engineering controls (e.g., building slabs, parking areas and roadways) or one foot of clean soil.

These remedial activities are directly related to construction activities associated with the future redevelopment at the Site which are dependent upon finalization of agreements with end users. Linden Development has been working throughout the reporting period to establish agreements with end users to ultimately occupy various portions of the Site. Given that end user agreements have not been established, the construction activities described in the RAWP have not yet been initiated.

During the reporting period, Linden Development imported structural fill materials from off-site sources for use during the redevelopment consistent with the RAWP and the Revised Soil and Concrete Reuse Proposal (Revision 1.0) approved by NJDEP. Materials imported prior to and during the reporting period are summarized in Table 1.

#### Groundwater

The RAWP for the Industrial #1 Redevelopment Area was limited to soils. Groundwater actions, if any, are related to resolution of the disputed groundwater issue between the Site and neighboring Merck Pharmaceutical facility. Evaluation of the disputed groundwater issue is ongoing.

#### Storm Sewer (AOI-18)

Remedial activities associated with AOI-18 are complete, as documented in Remedial Action Progress Report No. 1 (November 2009).

### ***2. NJDEP requires discussion of problems and delays in the implementation of the RAWP, which should include proposals for corrections.***

As discussed above, remedial activities are directly related to construction activities associated with the future redevelopment at the Site which are dependent upon establishment of agreements with end users. Given current economic conditions, the construction activities described in the RAWP will not be implemented until redevelopment deals with end users are established.

Linden Development is continuing to pursue agreements with end users for the Industrial #1 Redevelopment Area. In the interim, conditions at the Site are stable given that GM's original cover types (asphalt, building pads, etc.) remain intact.

### ***3. NJDEP requires proposals for a deviation from, or modification to, the approved RAWP.***

No deviations from, or modifications to, the approved RAWP are planned or required at this time.

**4. NJDEP requires submittal of a revised schedule pursuant to N.J.A.C. 7:26E-6.5, to reflect the changes as noted in 1 through 3 above.**

As noted above, establishment of agreements with end users is the driving force behind the redevelopment of the Site and implementation of the RAWP. Linden Development continues to pursue agreements with end users and will provide updates in subsequent quarterly reports. The next progress report is scheduled to be submitted on or before May 31, 2011.

**5. NJDEP requires an updated status of all permit applications relative to the critical path schedule.**

The permits required for initiation of the remedial activities are summarized below.

Permit/Approval Type	Status	Notes
Planning Board Approval	Approved 11/17/08	Site plan approved by City of Linden Planning Board
NPDES Permit (Storm Water)	Approved 9/16/09	NPDES Permit No. 0088323
Soil Conservation District	Approved 9/16/09	Approved by Somerset-Union Conservation District

**6. NJDEP requires a listing of each remedial action to be performed during the next reporting period.**

No remedial activities are scheduled during the next reporting period. As noted above, establishment of agreements with end users is the driving force behind the redevelopment of the Site and implementation of the RAWP. Linden Development continues to pursue agreements with end users and will provide updates in subsequent quarterly reports. The next progress report is scheduled to be submitted on or before May 31, 2011.

**7. NJDEP requires costs of each remedial action**

- i. Annual summary of all remedial action costs incurred to date; and**
- ii. Revised cost estimate for remedial actions remaining to be performed.**

Given that significant construction and remedial implementation has not yet commenced, no remedial costs have been accrued, with the exception of minor costs for the storm sewer cleaning (i.e., approximately \$7,000).

The cost estimate for completing remedial activities remains consistent with that presented in the RAWP (i.e., approximately \$11,900,000 for earthwork and construction of engineering controls).

**8. NJDEP requires a tabulation of sampling results (according to N.J.A.C. 7:26E-3.13(c)3) received during the reporting period and a summary of the data and any conclusions, presented in a format consistent with N.J.A.C. 7:26E-4.8.**

During the reporting period, Linden Development imported structural fill materials from off-site sources for use during the redevelopment consistent with the RAWP and the Revised Soil and Concrete Reuse Proposal (Revision 1.0) approved by NJDEP. Soil analytical

results associated with the materials imported during this reporting period are tabulated in Attachment B.

**9. NJDEP requires a summary of active groundwater remedial actions**

- i. groundwater elevation maps with groundwater flow shown immediately before and during active groundwater remediation;*
- ii. graphs depicting changes in concentrations over time for all impacted wells as well as all down-gradient wells;*
- iii. summary of volume of water treated since last reporting period and the total volume treated since active remedial action commenced; and*
- iv. Summary of groundwater contamination, indicating either that contamination remains above applicable standards (include a proposal detailing additional remedial actions) or that concentrations are below applicable standards.*

The RAWP for the Industrial #1 Redevelopment Area was limited to soils only. Therefore, this section is not applicable.

**10. NJDEP requires a summary of natural remediation groundwater remedial actions**

- i. Summary table of the groundwater monitoring results collected; and*
- ii. Conclusions whether data indicate that natural remediation is no longer appropriate (must then also submit a revised RAWP)*

The RAWP for the Industrial #1 Redevelopment Area was limited to soils only. Therefore, this section is not applicable.

**11. NJDEP requires a description of all wastes generated as a result of the remedial action**

- i. Tabulation of waste characterization samples collected, including the physical state of the material, volume, number of samples, analyses performed and results;*
- ii. Listing of types and quantities of waste generated by the remedial action during the reporting period as well as to date;*
- iii. Name of the disposal facility used;*
- iv. Transporters' dates of disposal; and*
- v. Manifest numbers of each waste shipment.*

No wastes were generated during the reporting period.

**12. NJDEP requires that any additional support documentation that is available also be provided (photos, etc.).**

Given that the majority of the remedial activities have not yet been implemented, no additional support documentation is available.

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The next scheduled remedial action progress report will include remedial actions completed between March 1 and May 31, 2011. Please feel free to contact Bill Dennis at (412) 446-0315 with any questions regarding the update provided herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Dennis III". The signature is stylized with a large, looped "B" and "D".

Bill Dennis  
Senior Project Manager

Attachments

ct: Brian Strohl – Linden Development, LLC  
Clifford Ng – U.S. EPA Region 2

## TABLES

**LINDEN DEVELOPMENT LLC SITE (FORMER GM LINDEN ASSEMBLY PLANT)  
1016 WEST EDGAR ROAD, LINDEN, NJ  
QUARTERLY REPORT NO. 6 - INDUSTRIAL NO. 1 REDEVELOPMENT AREA**

**TABLE 1  
SUMMARY OF FILL MATERIALS IMPORTED AS OF FEBRUARY 2011**

Import Date	Source	Supplier	Quantity	Material Type	Anticipated Site Use
<b>Soils and Crushed Concrete - Imported Prior to Current Reporting Period</b>					
Pre-February 2010	City of Rahway, NJ - Former firing range soil stockpile	City of Rahway, NJ	800 cy	Soils	Structural fill to be covered by engineering controls
Pre-February 2010	City of Linden, NJ - 2300 S. Wood Street - soil stockpile from City's Parks Dept.	City of Linden, NJ	2,865 cy	Soils	Structural fill to be covered by engineering controls
April / May 2010	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	2,973 cy	Soils	Structural fill to be covered by engineering controls
April / May 2010	Newark Public Schools Stadium - excess soils from construction project	AWT Environmental Services, Inc.	3,397 cy	Soils	Structural fill to be covered by engineering controls
May 2010	Newark Brick Tower - Residential Tower Demolition - processed backfill material	DEMREX and Altchem Environmental	15,680 cy	Soils/Crushed Concrete	Structural fill to be covered by engineering controls
June 2010	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	1,178 cy	Soils	Structural fill to be covered by engineering controls
June 2010	City of Linden, NJ - Library Site - excess soils from construction project	City of Linden, NJ	2,300 cy	Soils	Structural fill to be covered by engineering controls
July 2010	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	1,516 cy	Soils	Structural fill to be covered by engineering controls
8/24/10	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	658 cy	Soils	Structural fill to be covered by engineering controls
9/23/10	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	567 cy	Soils	Structural fill to be covered by engineering controls
9/27/2010	Weldon Materials - crushed stone (virgin source)	Weldon Materials	142 cy	Crushed Stone	Unrestricted (Virgin Source Material)
9/29/2010	Weldon Materials - crushed stone (virgin source)	Weldon Materials	55 cy	Crushed Stone	Unrestricted (Virgin Source Material)
10/5/10	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	699 cy	Soils	Structural fill to be covered by engineering controls
10/19/10	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	655 cy	Soils	Structural fill to be covered by engineering controls
		<b>Subtotal:</b>	<b>33,485 cy</b>		

LINDEN DEVELOPMENT LLC SITE (FORMER GM LINDEN ASSEMBLY PLANT)  
1016 WEST EDGAR ROAD, LINDEN, NJ  
QUARTERLY REPORT NO. 6 - INDUSTRIAL NO. 1 REDEVELOPMENT AREA

TABLE 1  
SUMMARY OF FILL MATERIALS IMPORTED AS OF FEBRUARY 2011

Import Date	Source	Supplier	Quantity	Material Type	Anticipated Site Use
Soils and Crushed Concrete - Imported During Current Reporting Period					
12/15/10	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	328 cy	Soils	Structural fill to be covered by engineering controls
12/16/10	New 121st. Police Precinct -970 Sanders Street, Staten Island, NY - excess soils from construction project	Pure Earth, Inc.	165 cy	Soils	Structural fill to be covered by engineering controls
		Subtotal:	493 cy		
	Total for Soils and Crushed Concrete Imported to Date:		33,978 cy		
Asphalt Millings - Imported Prior to Current Reporting Period					
Pre-February 2010	City of Linden, NJ - Residential Streets - asphalt millings	City of Linden, NJ	1,434 cy	Asphalt Millings	Subgrade material for future paved areas
		Subtotal:	1,434 cy		
Asphalt Millings - Imported During Current Reporting Period					
NA	None during current reporting period	NA	0		
		Subtotal:	0 cy		
	Total for Asphalt Millings Imported to Date:		1,434 cy		



**ATTACHMENT A**  
**Report Certification**

**Certification**

**Linden Development, LLC  
ISRA Case Number E20040531**

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein including all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, to the best of my knowledge, I believe that the submitted information is true, accurate and complete. I am aware that there are significant civil penalties for knowingly submitting false, inaccurate or incomplete information and that I am committing a crime of the fourth degree if I make a written false statement which I do not believe to be true. I am also aware that if I knowingly direct or authorize the violation of any statute, I am personally liable for the penalties.

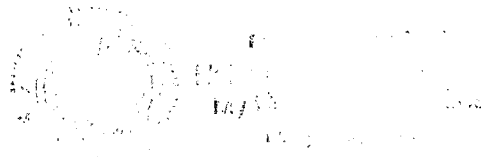
Date: 2/23/11

Linden Development, LLC  
By:

William J. DeBoer  
William J. DeBoer, Executive V.P.

Sworn to and subscribed to before  
me on this 23rd day  
of February, 2011

Deena C. Gniest  
Notary



**ATTACHMENT B**

**Analytical Results for Samples of Fill Material  
Imported During this Reporting Period**

New 121st Police Precinct - 970 Sanders Street, Staten Island, NY  
Excess Soils from Construction Project  
Table B-1 - Summary of Analytical Results (Detected Analytes Only)

Analyte	Units	Sample ID	TP-1C		TP-1G (4')		TP-2C		TP-2G (4')		TP-3C		TP-3G (4.5')		TP-4C		TP-4G (4.5')		TP-6C		TP-6G (4.5')		TP-5C		TP-5G (5')		TP-7C		TP-7G (4.5')		TP-8C		TP-8G (4')											
		Sample Date	12/23/2009		12/23/2009		12/23/2009		12/23/2009		12/23/2009		12/23/2009		12/23/2009		12/23/2009		12/23/2009		12/23/2009		12/24/2009		12/24/2009		12/24/2009		12/24/2009		12/24/2009		12/24/2009											
		CasNo		Q		Q		Q		Q		Q		Q		Q		Q		Q		Q		Q		Q		Q		Q		Q		Q										
VOCs																																												
Acetone	PPB	67-64-1	NT			95	C	NT			5.8	U	NT			5.5	U	NT			5.9	U	NT			6	U	NT			5.8	U	NT			5.7	U							
Methylene chloride	PPB	75-09-2	NT			37	B	NT			29	B	NT			22	B	NT			38	B	NT			15	B	NT			23	B	NT			35	B							
SVOCs																																												
2-Methylnaphthalene	PPB	91-57-6	130	U	NT				260	U	NT				270	U	NT				130	U	NT			100	J	NT			94	J	NT			130	U	NT						
Acenaphthene	PPB	83-32-9	130	U	NT				260	U	NT				270	U	NT				130	U	NT			540		NT			130	U	NT			130	U	NT						
Acenaphthylene	PPB	208-96-8	130	U	NT				260	U	NT				270	U	NT				130	U	NT			22	J	NT			130	U	NT			130	U	NT						
Anthracene	PPB	120-12-7	130	U	NT				50	J	NT				270	U	NT				130	U	NT			530		NT			130	U	NT			130	U	NT						
Benzo(a)anthracene	PPB	56-55-3	18	J	NT				350		NT				270	U	NT				130	U	NT			890		NT			130	U	NT			53	J	NT						
Benzo(a)pyrene	PPB	50-32-8	19	J	NT				280		NT				270	U	NT				130	U	NT			810		NT			130	U	NT			62	J	NT						
Benzo(b)fluoranthene	PPB	205-99-2	130	U	NT				410		NT				270	U	NT				130	U	NT			1100		NT			130	U	NT			79	J	NT						
Benzo(g,h,i)perylene	PPB	191-24-2	130	U	NT				250	J	NT				270	U	NT				130	U	NT			540		NT			130	U	NT			64	J	NT						
Benzo(k)fluoranthene	PPB	207-08-9	130	U	NT				110	J	NT				270	U	NT				130	U	NT			430		NT			130	U	NT			28	J	NT						
Bis(2-ethylhexyl)phthalate	PPB	117-81-7	130	U	NT				120	J	NT				270	U	NT				130	U	NT			120	U	NT			29	J	NT			77	J	NT						
Butyl benzyl phthalate	PPB	85-68-7	130	U	NT				260	U	NT				270	U	NT				130	U	NT			120	U	NT			98	J	NT			130	U	NT						
Carbazole	PPB	86-74-8	130	U	NT				260	U	NT				270	U	NT				130	U	NT			220		NT			130	U	NT			130	U	NT						
Chrysene	PPB	218-01-9	130	U	NT				280		NT				270	U	NT				130	U	NT			830		NT			130	U	NT			71	J	NT						
Dibenzo(a,h)anthracene	PPB	53-70-3	130	U	NT				260	U	NT				270	U	NT				130	U	NT			160		NT			130	U	NT			130	U	NT						
Diethyl phthalate	PPB	84-66-2	130	U	NT				260	U	NT				270	U	NT				130	U	NT			120	U	NT			28	J	NT			130	U	NT						
Di-n-butyl phthalate	PPB	84-74-2	130	U	NT				260	U	NT				270	U	NT				130	U	NT			120	U	NT			24	J	NT			130	U	NT						
Fluoranthene	PPB	206-44-0	130	U	NT				500		NT				270	U	NT				130	U	NT			2400		NT			130	U	NT			96	J	NT						
Fluorene	PPB	86-73-7	130	U	NT				260	U	NT				270	U	NT				130	U	NT			480		NT			130	U	NT			130	U	NT						
Indeno(1,2,3-c,d)pyrene	PPB	193-39-5	130	U	NT				260		NT				270	U	NT				130	U	NT			670		NT			130	U	NT			61	J	NT						
Naphthalene	PPB	91-20-3	130	U	NT				260	U	NT				270	U	NT				130	U	NT			210		NT			43	J	NT			130	U	NT						
Phenanthrene	PPB	85-01-8	130	U	NT				190	J	NT				270	U	NT				130	U	NT			1900		NT			130	U	NT			29	J	NT						
Pyrene	PPB	129-00-0	23	J	NT				450		NT				270	U	NT				130	U	NT			1500		NT			130	U	NT			74	J	NT						
Pesticides																																												
4,4'-DDD	PPB	72-54-8	3		NT				5.2		NT				2.2	J					14		NT			2.2	U	NT			30		NT			1.9	J	NT			5.9		NT	
4,4'-DDE	PPB	72-55-9	2.1	U	NT				1.7	J	NT				2.3	U					2.5		NT			2.2	U	NT			4.3		NT			2.2	U	NT			2.2	U	NT	
4,4'-DDT	PPB	50-29-3	2.1	U	NT				2.1	U	NT				2.3	U					6.1		NT			2.2	U	NT			2.1	U	NT			2.2	U	NT			2.2	U	NT	
alpha-Chlordane	PPB	5103-71-9	2.1	U	NT				4.4		NT				2.3	U	NT				2.2	U	NT			2.2	U	NT			2.1	U	NT			2.2	U	NT			2.2	U	NT	
gamma-Chlordane	PPB	5103-74-2	2.1	U	NT				0.89	J	NT				2.3	U	NT				2.2	U	NT			2.2	U	NT			2.1	U	NT			2.2	U	NT			2.2	U	NT	
Metals																																												
Aluminum	PPM	7429-90-5	6840		NT				5710		NT				5560		NT				5490		NT			5900		NT			4830		NT			6390		NT			4610		NT	
Arsenic	PPM	7440-38-2	3.93		NT				3.27		NT				3.62		NT				2.63		NT			2.29		NT			3.54		NT			3.93		NT			2.35		NT	
Barium	PPM	7440-39-3	40.5		NT				31.3		NT				31.2		NT				23.9		NT			25.2		NT			20.4		NT			34.4		NT			21.9		NT	
Calcium	PPM	7440-70-2	5710		NT				19000		NT				3020		NT				1200		NT			5670		NT			5230		NT			4590		NT			247		NT	
Chromium	PPM	7440-47-3	15.2		NT				10.9		NT				18.2		NT				8.8		NT			9.34		NT			9.19		NT			9.64		NT			8.41		NT	
Cobalt	PPM	7440-48-4	0.428	U	NT				0.43	U	NT				0.808		NT				0.401	U	NT			0.425	U	NT			0.395	U	NT			0.418	U	NT			0.412	U	NT	
Copper	PPM	7440-50-8	12.6		NT				13.9		NT				11.9		NT				7.84		NT			6.36		NT			13		NT			7.94		NT			6		NT	
Iron	PPM	7439-89-6	15800		NT				12700		NT				13500		NT				11100		NT			13000		NT			12400		NT			12200		NT			9040		NT	
Lead	PPM	7439-92-1	13.2		NT				13.4		NT				33.2		NT				6.35		NT			5.53		NT			17.5		NT			8.55		NT			4.61		NT	
Magnesium	PPM	7439-95-4	4680		NT				9390		NT				2370		NT				1920		NT			4810		NT			3720		NT			1580		NT			1320		NT	
Manganese	PPM	7439-96-5	204		NT				174		NT				377		NT				113		NT			96.7		NT			113		NT			138		NT			124		NT	
Mercury	PPM	7439-97-6	0.0113	U	NT				0.0189		NT				0.039		NT				0.0102	U	NT			0.0111	U	NT			0.0287		NT			0.0176		NT			0.0101	U	NT	
Nickel	PPM	7440-02-0	12.1		NT				10.4		NT				25.4		NT				11.5		NT			7.45		NT			11.8		NT			8.81		NT			7.25		NT	
Potassium	PPM	7440-09-7	1780		NT				1690		NT				1140		NT				1170		NT			1270		NT			1150		NT			1260		NT			972		NT	
Sodium	PPM	7440-23-5	265		NT				206		NT				232		NT																											

Notes:  
C - Calibration %RSD/%D exceeded for non-COC analytes  
H - Holding times for preparation or analysis exceeded  
NT - Not tested  
U - Indicates that the compound was analyzed but not detected  
B - Analyte detected in the associated in the method blank  
J - Analyte detected below quantitation limits

**Table B-1 - Summary of Analytical Results (Detected Analytes Only)**

[illegible]

Notes:

- C - Calibration %RSD/%D exceeded for non-COC analytes
- H - Holding times for preparation or analysis exceeded
- NT - Not tested
- U - Indicates that the compound was analyzed but not detected
- B - Analyte detected in the associated in the method blank
- J - Analyte detected below quantitation limits